



Travel Management Rule

FAQ's - Subpart A: Administration of the Forest Transportation System

1. What is Travel Analysis? Didn't you just finish this when you designated roads for us to use?

Travel Management Subpart B required designating a system of roads, trails, and areas open for Motor Vehicle Use identified by vehicle type and if needed, by season of use. The focus was on unmanaged motor vehicle recreation taking place off of the existing road system. Subpart B changed the culture of motor vehicle use on roads, trails, and areas from "Open unless closed" to a system of designated routes. The goal is to reduce resource impacts by motor vehicles traveling cross-country. The Deciding Official used a set of criteria in making Subpart B decisions. The affordability of the road system was also taken into consideration.

Subpart A requires a broad-brush look at the roads on the entire forest. It requires a look at the issues, risks, and benefits for all users and the associated forest resources. We'll look at available data, and information that we receive from you about our roads. Once we have this information about the roads, access needs, and the affected forest resources, we will see where there may be a need for the road system to change. We have to leverage the funding we receive to keep our roads maintained for safe access and for the protection of forest resources. It is critical for everyone to work together toward an affordable and environmentally sustainable road system. The road system must also meet Forest Service management goals and responsibilities and access needs.

2. Why are you doing this now, after going through Subpart B?

The objective of the route designation effort (Subpart B) was to reduce resource damage from unmanaged motor vehicle use off the existing road system and to determine which NFS roads, trails, and areas (by vehicle type and season of use) were designated for motor vehicle travel. Subpart B did not look at the risks, benefits, and opportunities of *all* system roads. It did not analyze roads outside Forest Service jurisdiction for potential acquisition of right of way. Generally, Subpart B did not look at decommissioning system roads. It considered, but did not analyze financial sustainability of the entire road system.

Travel Analysis is one step toward fulfillment of Subpart A. It will influence and lead to proposed actions and environmental analysis that will identify the minimum road system. Travel Analysis will inform future decisions for management of the National Forest Transportation System (NFTS), including forest plan revisions, and ecosystem restoration and management projects. Travel Analysis will inform *future designations* of roads, trails, and areas for motor vehicle use.

Our priority now is to work toward fulfillment of the intent of Subpart A by conducting a Forest-wide Travel Analysis to help us leverage the funding we receive to manage the NFTS in the best way possible. There are several things happening at once. The demand for road use is escalating. The roads and bridges are aging, wildlife impacts are occurring, and sediment from roads is contributing to water quality degradation.

In the Pacific Southwest Region, the National Forests are on an accelerated schedule to complete their Travel Analysis before the nationally-directed September 2015 deadline. The Forest-scale Travel Analysis will provide a broad view of where the issues and risks of each system road meet with the benefits. The resulting Travel Analysis Report will be used to inform proposed actions to change the road system and work toward identifying the minimum road system.

3. Why aren't you identifying the Minimum Road System? When do expect to identify your Minimum Road System?

The minimum road system is the road system determined to be needed to meet resource and other management objectives adopted in the relevant land and resource management plan (36 CFR part 219), to meet applicable statutory and regulatory requirements, to reflect long-term funding expectations, to ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance (36 CFR 212.5(b)(1)).

The Deputy Chief's Office of the Forest Service recently clarified the role of Travel Analysis in identification of the minimum road system. Travel Analysis does not result in a decision, and does not trigger NEPA. However, identification of the Minimum Road System is a decision, and therefore subject to analysis performed under NEPA.

The idea of doing forest-scale Travel Analysis under NEPA to determine the minimum road system would not do justice to the site specific needs of the individual drainages or access routes. Therefore, the Travel Analysis Report will be used toward the development of the future minimum road system, probably at a watershed level scale, or smaller.

The NEPA analyses will occur after this Forest-wide Travel Analysis is completed, and when Forests address issues that include system roads in a particular watershed, a more detailed Travel Analysis will be done again at that scale. Timing will also be dependent upon funding for analysis, and again when a decision is implemented.

4. Will Travel Analysis close more roads?

No. Travel Analysis does not result in a decision to make changes to the road system. It will, however, identify and analyze issues, risks, benefits, and opportunities for possible future changes to the road system. Closing roads to motor vehicle use, but maintaining use as a trail may be an opportunity identified in Travel Analysis. However, the opportunity to convert a road to a trail must consider sustainability of the trail system, too.

5. Will Travel Analysis add more roads?

No. Travel Analysis does not result in a decision to make changes to the road system. It will, however, identify and analyze issues, risks, benefits, and opportunities for possible future changes to the road system. The analysis will consider the presence of unauthorized routes or temporary roads in context with a potential opportunity to provide access where a need is identified, but a system road does not exist. Adding more roads to the road system may still be identified as an opportunity in Travel Analysis.

6. Will the roads just added stay open?

Travel Analysis may include opportunities for potential changes to any roads, including those that were recently added under Travel Management Subpart B. Travel Analysis does not result in a decision to make changes to the road system. Any road currently designated as open for motor vehicle use, whether recently added to the system, or as part of the road system for decades, will remain open until environmental analysis to determine the minimum road system and site-specific analysis (both under NEPA) decide otherwise.

7. You didn't listen before, so why should we tell you what we want now?

We hear the requests for more access. We hear the requests for fewer roads. We hear the complaints about roads in poor condition. We know the requirements to minimize environmental and cultural impacts. We stretch our funding for road maintenance and environmental protections as far as we can. Unfortunately, all these things don't merge. There are gaps.

As an agency, we can always improve our communication. As such, one of our main goals as we proceed with Travel Analysis is to work better with the Public. Public participation adds the people perspective to the science-based element of Travel Analysis. Travel Analysis is a tool that will allow the interests of the public, along with access needs, requirements, and limitations of the forest to be displayed with respect to the roads. We are asking the public to review the road system with us, and help us recommend opportunities that lead to a safe, affordable and environmentally sustainable road system; to help make the gaps smaller.

8. How will I be able to prospect or explore for locatable minerals?

Those activities can continue on roads designated for public motor vehicle use. Individuals with mineral rights may also have access provided by roads that are closed to the general public, and are handled on an individual basis. Aside from areas specifically withdrawn from mineral entry, such as designated Wilderness Areas, you are invited to share information about the areas you feel are important for the purpose of prospecting or exploring. Travel Analysis will include your information to identify affected areas as potentially requiring access, or maintaining access, depending on location. Miners' rights to conduct locatable mineral operations on NFS lands under the United State mining laws are not absolute; miners must comply with reasonable regulations promulgated by the Forest Service to protect NFS lands.

9. How will I get to my property? mining claim? special use permit area? recreation residence?

Travel Analysis will not affect access to private property, mining claims, permitted use areas or recreation residences. In fact, those uses *affect* Travel Analysis by disclosing the need for roaded access of some type. Each use, such as those mentioned above, have different stipulations and conditions imposed under the authorizing document (permit, easement, etc.). For example, use of access roads and responsibility for maintaining access vary from one authorization to another. Or the authorizing document may be silent on the subject, suggesting a review or modification. All that information will be gathered into Travel Analysis during Step 1 – Setting up the Analysis.

10. How will I be able to get firewood or go hunting/camping if you close more roads?

Travel Analysis does not result in a decision to make changes to the road system, such as closing roads. It will, however, identify and analyze issues, risks, benefits, and opportunities for possible future changes to the road system. You are invited to share those locations that are important to access for fuel wood gathering, hunting, camping, etc. Travel Analysis will include your information to identify areas where motor vehicle access is desired to be sustained or improved. The analysis will identify opportunities that lead to an affordable and environmentally sustainable road system with a full understanding of associated tradeoffs.

11. What if you decide my favorite roads are no longer needed?

Let us know what values you associate with your favorite roads. Together with input from others, as well as available data on affected resources, those values and issues associated with roads will be analyzed by the forest. Travel Analysis will not make a decision to remove roads from the road system, but it may list system roads with lower benefit to risk/cost ratio as opportunities to change or close.

12. How will you fight fires if you close all your roads?

One of the risk categories that will be analyzed under Travel Analysis is the ability to respond to emergencies with the current road system, including access for firefighting efforts. The analysis will look at historical fire data, locations, frequency, severity, etc. to display areas most at risk, and possibly requiring continued roaded access. Travel Analysis will not close roads, as it is not a decision. It's a risk/benefit analysis.

13. How will you make sure that roads don't pollute our water under the Clean Water Act?

Concerns over water quality from road impacts probably vary greatly from person to person. But downstream, the water quality takes on a different importance: the 18 national forests of California are the source of approximately 47% of the water supply for the state. Road density is a contributing factor in how well a watershed functions. Protecting the water quality from road impacts is one of the reasons for road system maintenance (Best Management Practices), in addition to providing safe access. Travel Analysis provides the tool to see where the most risks to resources overlap with the forest needs and the needs of the users. Impact to water quality is one of the leading reasons for identifying roads for potential reconstruction (Stormproofing) or decommissioning, as well as identifying essential roads with higher maintenance costs.

14. How will you assure there are roads for access by persons with disabilities?

Travel Analysis will not make changes in the current road system. In the future, any restrictions on motor vehicle use that are applied consistently to everyone, including persons with disabilities, are not discriminatory. Generally, granting an exemption from restricted motor vehicle access for people with disabilities would not be consistent with resource protection; neither are exemptions aligned with accessibility regulations or the travel management rule. Under section 504 of the Rehabilitation Act of 1973, no person with a disability can be denied participation in a Federal program that is available to all other people solely because of his or her disability. Consistent with 36 CFR 212.1, FSM 2353.05, and Title V, Section 507(c), of the Americans With Disabilities Act, wheelchairs and mobility devices, including those that are battery-powered, that are designed solely for use by a mobility-impaired person for locomotion and that are suitable for use in an indoor pedestrian area are allowed on all NFS lands that are open to foot travel.

15. What do you consider your current road system? It should be every road that's out there.

The current road system being analyzed consists of all National Forest System Roads, which are existing and under Forest Service jurisdiction. This includes: roads that are open to the public for motor vehicle use; roads that are closed to the general public but are used for administrative purposes; and roads in storage (closed for more than a year, to be opened for specific projects, and then returned to storage). Travel Analysis will analyze all National Forest System Roads as described above. The presence and use of other system roads (private, county, state, other federal agency, etc.) will be considered in the analysis in context only, as they affect access needs, risks, and benefits, and in some cases, cost to maintain. Unauthorized routes and temporary roads, while acknowledged as present on the landscape, will be considered in context (i.e. watershed impacts from route density, potential future additions to the road system, etc.).

16. Will the roads in Roadless Areas be closed? RS 2477 will prevent you from closing any more roads.

Travel Analysis does not close roads. Roadless Areas have additional requirements for changes to system roads. All system roads, including those in Roadless Areas, will be included in Travel Analysis. RS 2477 rights-of-way are for public highways under the jurisdiction of state, county, or local public road authorities. Only a public entity, such as a state, county or municipal agency, may assert a right under R.S. 2477. Processes do exist, however, for providing access for miners or others interested in obtaining permits. We ask you to share information about the specific roads and areas you feel are important to keep open. Travel Analysis will include your information to identify affected areas as potentially requiring access, or maintaining access, depending on location.

17. What will you do about important roads that cause a lot of environmental damage?

Travel Analysis won't "do" anything with roads causing environmental damage, but the analysis will use science-based data to broadly identify the type and location of environmental damage. In addition, the analysis will identify the "importance" or benefit of roads for access. The Travel Analysis report will show roads of great environmental concern, roads with high degree of benefits, and potential opportunities

or recommendations to keep the road and mitigate impacts within funding limits. Detailed recommendations would be provided after site-specific environmental analysis performed under NEPA at a later date.

18. Where do I go, or who do I call, to get more information?

The Klamath National Forest has a Travel Analysis team, who can be reached through Lori Jackson, Forest Roads Manager, at (530) 841-4420. You can also find more information on the internet at <http://www.fs.usda.gov/main/r5/about-region/offices> and navigate to the forest location of your choice. Each forest will have a webpage to keep interested stakeholders informed, and will include detailed contact information.

19. How do I give you my comments?

The Supervisor's Office of each national forest will have forms available for you to share your comments. In addition, each District Ranger office will have forms available for your comments. Each national forest will have a webpage for Travel Analysis, which will include a digital comment form in Adobe Acrobat PDF format. You may give your comments when a national forest conducts an open house, field trip, or other venue that includes public involvement.